

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| Improving Public Safety Communications in the |) | WT Docket No. 02-55 |
| 800 MHz Band |) | |
| |) | |
| Consolidating the 900 MHz Industrial/Land |) | |
| Transportation and Business Pool Channels |) | |
| | | |
| To: The Commission | | |

COMMENTS

Aeronautical Radio, Inc. (“ARINC”), United Airlines (“United”), and Northwest Airlines (“Northwest”) (jointly the “Airlines”) hereby respectfully submit their Comments in response to the Supplemental Comments filed by the Consensus Parties in the above-captioned proceeding.¹

ARINC, United and Northwest are licensees of private radio systems in the 800 MHz and/or 900 MHz band. Collectively, these three entities are the licensees of more than a hundred of frequencies on a nationwide basis. As noted in previous filings submitted by the Airlines, the ground radio systems operating pursuant to these authorizations are vital to the airline industry, and vital to security at airports throughout the country.

Both ARINC and Northwest have experienced interference to their 800 MHz operations. Therefore, ARINC and Northwest are well familiar with the problems being experienced, as well as the burden of the task which they face under the Consensus Proposal in rebanding.

¹Wireless Telecommunications Bureau Seeks Comments On “Supplemental Comments of the Consensus Parties” Filed in the 800 MHz Public Safety Interference Proceeding, WT Docket No. 02-55, DA No. 03-19 (WTB Jan. 3, 2003); Order Extending Time For Filing Of Comments, WT Docket No. 02-55, DA 03-163 (PSPWD Jan. 16, 2003).

The Airlines have decided to submit separate Comments in this proceeding as the result of misinformation conveyed in the January 10, 2003 Comments of Small Business in Telecommunications (“SBT”). Specifically, SBT stated that the Consensus Proposal is “missing support” from the airline industry.²

To the contrary, ARINC is one of the signatory parties to the Consensus Proposal (and in fact ARINC is the first participant listed). ARINC is one of the primary drafters of the Consensus Proposal, and in fact met with counsel to SBT as part of Private Wireless Coalition meetings. In fact, many of the concepts introduced in the Consensus Proposal were developed by ARINC. Most of the major United States airlines are owners of ARINC, and all airlines were briefed on ARINC positions at quarterly ARINC meetings. The Consensus Proposal enjoys the full support of ARINC (one of the most impacted 800 MHz licensees) and ARINC urges the adoption of the Proposal.

For its part, United’s 800 MHz operations in Denver, Colorado, and 900 MHz operations at Dulles International Airport in Virginia and at Los Angeles International Airport are deeply impacted in this proceeding. United fully supports the efforts of the PWC on its behalf, as well as ARINC’s efforts.

Finally, Northwest’s 800 MHz operations in Detroit, Michigan and Minneapolis, Minnesota will also be impacted by the Commission’s actions in this proceeding. Most importantly, Northwest’s operations in Detroit utilize so-called “Border Area Frequencies”. Therefore, Northwest has closely watched the development of the Consensus Proposal on this issue. Northwest’s Paul Anderson serves as Chairman of the Board of ITA, and as such Northwest has

²SBT Comments at 2.

been significantly involved in the development of ITA's positions in this proceeding. ITA enjoys Northwest's full support, and Northwest will continue to work with ITA and ARINC to reach a successful resolution in this proceeding.

WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

AERONAUTICAL RADIO, INC.
UNITED AIRLINES
NORTHWEST AIRLINES

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